

JACK P. DICANIO (SBN 138782)
Jack.DiCanio@skadden.com
MICHELLE KAO (SBN 322758)
Michelle.Kao@skadden.com
OLIVIA L. VADEN (SBN 334405)
Olivia.Vaden@skadden.com
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
525 University Avenue
Palo Alto, California 94301
Telephone: (650) 470-4500
Facsimile: (650) 470-4570

MATTHEW E. SLOAN (SBN 165165)
Matthew.Sloan@skadden.com
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
300 South Grand Avenue, Suite 3400
Los Angeles, California 90071-3144
Telephone: (213) 687-5000
Facsimile: (213) 687-5600

Attorneys for Defendant
FUJIAN JINHUA INTEGRATED CIRCUIT CO., LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

UNITED MICROELECTRONICS
CORPORATION et al.,

Defendants.

CASE NO.: 3:18-cr-00465-MMC

**JOINT STIPULATION TO EXTEND
BRIEFING SCHEDULE FOR
DEFENDANT FUJIAN JINHUA'S
RENEWED AND AMENDED
MOTION FOR A BILL OF
PARTICULARS (Dkt. 164);
[PROPOSED] ORDER**

Judge: The Honorable Maxine M. Chesney
Trial Date: February 14, 2022

JOINT STIPULATION

Defendant Fujian Jinhua Integrated Circuit Co., Ltd. ("Jinhua") and the United States (collectively, the "Parties"), by and through their undersigned counsel, stipulate to the following and respectfully request the Court to enter an order regarding the following proposed briefing and hearing schedule for Jinhua's Renewed and Amended Motion for a Bill of Particulars (Dkt. 164):

1 WHEREAS, on May 5, 2021, Jinhua filed its Renewed and Amended Motion for Bill of Particulars
2 (“Motion”) (Dkt. 164);

3 WHEREAS, pursuant to Criminal Local Rule 47-2(d), the United States’ deadline to oppose or
4 otherwise respond to the Motion would be May 12, 2021;

5 WHEREAS, the parties have agreed to extend the United States’ deadline to file its opposition or
6 otherwise respond to Jinhua’s Motion from May 12, 2021 to May 26, 2021, and have further agreed to
7 extend Jinhua’s deadline to file a reply brief in support of its Motion to June 9, 2021;

8 WHEREAS, the parties further agreed to set the hearing date on Jinhua’s Motion for June 16,
9 2021, subject to the Court’s availability;

10 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
11 undersigned counsel for Jinhua and the United States, as follows:

12 1. That the deadline for the government to file any opposition to Jinhua’s Motion be extended
13 to May 26, 2021;

14 2. That the deadline for Jinhua to file any reply brief in support of Jinhua’s Motion be
15 extended to June 9, 2021;

16 3. That, subject to the Court’s availability, the hearing on Jinhua’s Motion should be held on
17 June 16, 2021; and

18 4. Nothing herein shall be deemed to constitute a waiver of any rights, claims, defenses,
19 motions, or objections that a party may have or make with respect to the claims set forth in this action.

20 WHEREFORE, Jinhua and the United States respectfully request that the Court
21 enter this Stipulation and the [Proposed] Order below setting an extended briefing schedule.

22 SO STIPULATED AND AGREED.

23 Dated: May 7, 2021

Respectfully Submitted,

24 /s/ Matthew E. Sloan
25 JACK P. DICANIO
26 MATTHEW E. SLOAN
Attorney for Defendant
Fujian Jinhua Integrated Circuit Co. Ltd.

27 STEPHANIE M. HINDS
28 Acting United States Attorney

1 In compliance with Local Civil Rule
2 5-1(i)(3), I, Matthew E. Sloan, attest
3 that Laura Vartain Horn has
4 concurred in this filing.

/s/ Laura Vartain Horn
LAURA VARTAIN HORN
Assistant United States Attorneys

NICHOLAS O. HUNTER
STEPHEN MARZEN
Trial Attorneys, National Security Division

[PROPOSED] ORDER

Good cause appearing, as set forth in the parties' Joint Stipulation, the Court hereby sets the following extended briefing schedule for defendant Fujian Jinhua Integrated Circuit Co., Ltd.'s ("Jinhua") Renewed and Amended Motion for a Bill of Particulars (Dkt. 164):

Event	Date	
United States' deadline to oppose or otherwise respond to Jinhua's Motion	May 26, 2021	
Jinhua's deadline to file reply in support of its Motion	June 9, 2021	
Hearing on Jinhua's Motion	June 16, 2021	

IT IS SO ORDERED.

Dated:

MAXINE M. CHESNEY
United States Senior District Judge